

DECLARATION OF VIRGINIA SNYDER

I, VIRGINIA SNYDER, declare as follows under penalty of perjury:

1. I am a private investigator licensed in the State of Florida (954C). I am 61 years old.

2. I have been retained by the attorneys for the Church of Scientology of California.

3. In the fall of 1981, I first had contact with Robert Bickerstaff, a member of the City of Clearwater's Planning and Zoning Board, concerning the future development of Downtown Clearwater.

4. Based on this prior contact, on April 13, 1982, I again contacted Mr. Bickerstaff with a view to learning more about the "Scientology Victims Defense Fund" of which he is President. This is an anti-Scientology organization. Under the pretext of having a wealthy aunt interested in contributing to the fund, I elicited information from Mr. Bickerstaff as to the goals and programs of the fund. This discussion took place over dinner the evening of April 13, 1982.

5. During this conversation, Mr. Bickerstaff told me that Attorney Michael Flynn of Boston, Massachusetts recently informed members of the Scientology Victims Defense Fund on more than one occasion that he and other attorneys hope and expect to get 10 or 12 lawsuits "going" against the Church as soon as possible.

6. Mr. Bickerstaff also explained to me that Mr. Flynn's strategy was that if there were enough lawsuits brought against the Church with accompanying expenses that would exceed the Church's income, this would result in achieving the goal of breaking the Church financially.

Executed this 14th day of April, 1982, at Clearwater, Florida.

I hereby, under penalty of perjury, state that the foregoing is true and correct.

Virginia Snyder  
VIRGINIA SNYDER